

ENERGY STAR® Residential Dehumidifier Program Industry Comments on Draft 1 Product Specification July 21, 2000



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EPA wishes to thank everyone who reviewed the Draft 1 Product Specification and submitted comments. The following is a summary of industry comments received to date from approximately 7 companies. All feedback will be considered as EPA prepares the Draft 2 Specification, which will be posted on the Internet at www.energystar.gov in mid to late August 2000. The Final Specification will then be released in mid to late September 2000.

General

• Five manufacturers stated that they support the development of a Dehumidifier Program and are committed to participating in the Program as it's launched.

Definitions

• One organization recommended revising part b of the Dehumidifier definition to read "a refrigerating system" as opposed to "a refrigerated system."

Product Capacity

- Several manufacturers requested that the upper capacity limit be extended beyond 30 L/day. Without this change, they believe some products currently on the market (e.g., 65-pint capacity) will be excluded from the program.
- One manufacturer suggested that the upper limit be at least 31 L/day.
- Another manufacturer recommended 35 L/day with an Energy Factor of greater than or equal to 1.5.
- One respondent asked EPA to consider creating a specification for dehumidifiers with a capacity of 100 pints/day.

Pints versus Liters

 One manufacturer expressed concern that the draft specification uses liters as opposed to pints. In the United States, product information is provided in pints and therefore the consumer may be confused when he/she sees ENERGY STAR information in liters.

Energy Factor

- One respondent recommended that the Energy Factor values be carried to two decimal places (i.e., 1.20, 1.30, and 1.50).
- One manufacturer stated that the 1.5 L/kWh specification is too stringent and suggested replacing it with a graduated scale.

Effective Date

- A few manufacturers indicated that they supported EPA's proposed effective date of January 1, 2001.
- A few manufacturers suggested that EPA finalize the specifications by mid to late September and provide an effective date of November 1, 2000 (i.e., manufacturers have four to six weeks of lead time before the Program takes effect).
- One respondent recommended that the Program take effect as soon as possible.

Product Testing

• One manufacturer suggested that different temperature conditions be considered that are more representative of actual (not laboratory) operating conditions in the consumer's home.

Consumer Information

• One manufacturer encouraged EPA to provide information, along with its energy-efficiency specifications, to help consumers choose: 1) appropriately sized equipment, and 2) product features (e.g., humidistat, air filter, de-icing device) that will further improve the effectiveness, efficiency, and reliability of the dehumidifier.